

Gehring & Satriale LLC

Louis R. Satriale, Jr.
(212) 400-7422
lsatriale@GTSLaw.com

370 Lexington Avenue
Suite 1200
New York, New York 10017
(212) 400-7420
(212) 400-7440 (fax)

February 6, 2008

VIA FACSIMILE

Hon. Charles L. Bricant
United State District Judge
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Freddy Morochio et al. v. George Kelly et al.
Index No. 07 Civ. 2979 (CLB) (MDF)

Dear Judge Bricant:

We represent defendants in the above-referenced action. On behalf of all parties, I write to jointly request a three-week extension of time from February 8, 2008 to February 29, 2008 to complete depositions. There has been no prior request for an extension of time regarding the Civil Case Discovery Plan and Scheduling Order ("Scheduling Order") in this matter.

Today, we were at the Courthouse to conduct the depositions of three plaintiffs. Tomorrow, three more depositions are scheduled at the Courthouse. Shortly after we began the depositions today, the Spanish interpreter hired to assist with the depositions of the plaintiffs advised the parties that he had just been informed of a family emergency and had to leave immediately for the day. I have not yet been advised if he will be able to resume tomorrow. In any event, it is clear that the parties will not be able to complete all the depositions by Friday.

Plaintiffs' counsel and I have discussed our respective schedules and the schedules of the remaining witnesses and respectfully request until February 29th to complete the depositions. The Scheduling Order currently provides that all discovery is to be complete by March 14, 2008 and the parties are not seeking an extension of that date.

Respectfully submitted,


Louis R. Satriale, Jr.

cc: Karen Zdanis, Esq. (via facsimile)
Counsel for Plaintiffs